REMARKS

Claims 1-30 are currently pending in the subject application and are presently under consideration. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments herein.

I. Rejection of Claims 1, 7, 8, 15-18, 23-25 and 27-29 Under 35 U.S.C. §102(e)

Claims 1, 7, 8, 15-18, 23-25 and 27-29 stand rejected under 35 U.S.C. §102(e) as being anticipated by Hanson *et al.* (U.S. Patent 6,546,425). This rejection should be withdrawn for at least the following reasons. Hanson *et al.* does not teach or suggest ***each and every element*** of the claimed invention.

> For a prior art reference to anticipate, 35 U.S.C. §102 requires that "***each and every element*** as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (*quoting Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)) (emphasis added).

Independent claim 1 (and similarly independent claims 17, 23, 24, and 27) is directed towards a system that employs a first computer system for directing a call to invoke a remote procedure in a second computer system. The second computer system, upon completion of the remote procedure, generates an event trigger and transmits the event trigger and remote procedure results to the first computer system. The first computer system and second computer system communicate *via* a non-persistent connection.

The Examiner contends that Hanson *et al.* discloses "a first computer system (Mobile End System) for directing a call to invoke a remote procedure (remote procedure call) in a second computer system (Mobility Management System)" and cites column 4, lines 3-17 of Hanson *et al.* in support of such contention. Applicants' representative respectfully disagrees with such assertion – Hanson *et al.* fails to teach or suggest ***a first computer system for directing a call to invoke a remote procedure in a second computer system*** as recited in independent claim 1 (and claims 17, 23, 24 and 27). Rather, in Hanson *et al.* the Mobility Management Server is acting *in lieu* of, or as a proxy for, the Mobile End System.

In the Final Office Action it is asserted "Figures 1 and 2 clearly teaches that the two systems are distinct from one another..." However, the corresponding description of Figure 1 provides "***Mobility Management Server 102 serves as network level proxy for Mobile End Systems 104 by maintaining the state*** of each Mobile End System, and by handling the complex session management required to maintain persistent connections to any peer systems 110 that host network applications..." (Hanson *et al.* at col. 7, lines 35-41) (emphasis added). Additionally, the corresponding description of Figure 2 describes the Mobility Management Server as intercepting messages to/from the Mobile End Systems and able to recognize messages from an associated session peer (Fixed End System) destined for the Mobile End System. (*See e.g.* Hanson *et al.* at col. 12, lines 1-7). Thus, contrary to the assertion in the Final Office Action, the Mobile End System and Mobility Management Server are not *distinct from one another* and Hanson specifically discloses that the Mobility Management Server acts as a proxy for the Mobile End System. (*See e.g.* Hanson *et al.* at col. 7, lines 36-43; col. 8, lines. 56-60; col. 9, lines 62-65).

Additionally, the Mobility Management Server maintains the state of the Mobile End System to maintain persistent connections ***to peer systems that host network applications***.

> Mobility Management Server 102 maintains the state of each Mobile End System 104 and handles the complex session management required to maintain persistent connections to associated peer 108 such as host computer 110 attached to the other end of the connection end point. If a Mobile End System 104 becomes unreachable, suspends, or changes network address (e.g., due to roaming from one network interconnect to another), the ***Mobility Management Server 102 maintains the connection to the host system 110*** or other connection end-point, ***by acknowledging receipt of data and queuing requests. This proxy function*** means that the peer application never detects that the physical connection to the Mobile End System 104 has been lost--allowing the Mobile End System's application(s) to effectively maintain a continuous connection with its associated session end point...

(Hanson *et al.* at col. 9, line 55 through col. 10, line 3) (emphasis added). (*See also e.g.* Hanson *et al.* at col. 3, ln 27-33; col. 8, ln 51-60; col. 10, ln 22-28).

Further, the Mobile End System does not direct a call to invoke a remote procedure in the Mobility Management Server but rather to invoke a procedure in a peer system or fixed end system. The Mobility Management Server receives the call from the Mobile End System and assumes the role of the Mobile End System to communicate and invoke remote procedures with peer systems that host network applications. Thus, it is the peer system that performs the remote procedure, not the Mobility Management Server as contended in the Office Action.

Additionally, Hanson *et al.* discloses that the "***RPC events originate*** as a result of network 108 activity ***by the association specific connection*** (usually the Fixed End System 110). ***These RPC event messages are***, in the preferred embodiment, ***proxied by the Mobility Management Server 102 and forwarded to the Mobile End System 104.***" (Hanson *et al.* at col. 19 lines 54-58) (emphasis added). (*See also e.g.*, Hanson *et al.* at col. 19, lines 41-43.) For example, Hanson, *et al.* discloses the following RPC event calls and the proxy function of the Mobility Management Server.

> Disconnect Event (this occurs when association-specific connected peer (usually the ***Fixed End System 110) issues*** a transport level disconnect request; the disconnect ***is received by the proxy server 224 on behalf of the Mobile End System 104***...
>
> Stream Receive Event (this event occurs when the association-specific connected peer (usually the ***Fixed End System*** 110) has ***sent*** stream data to the Mobile End System 104; ***the proxy server 224 receives this data on behalf of the Mobile End System 104***...
>
> Receive Datagram Event (this event occurs when any association-specific portal receives datagrams ***from*** a network peer (usually the ***Fixed End System*** 110***) destined for the Mobile End System 104 through the Mobility Management Server 102;*** the proxy server 224 accepts these datagrams on behalf of the Mobile End System, and forwards them to the Mobile End System...
>
> Connect Event (this event occurs when the association-specific listening portal receives a transport layer connect request (usually ***from the Fixed End System 110)*** when it wishes to establish a transport layer end-to-end connection with a Mobile End System 104***; the proxy server 224 accepts the connect request on behalf of the Mobile End System***...

(Hanson *et al.* at col. 19, line 54 through col. 20, line 23) (emphasis added). Thus, it is clearly evident that the Mobility Management Server of Hanson *et al.*, as disclosed, is simply a proxy that is acting for the Mobile End System and the Mobile End System does not direct a call to invoke a remote procedure in the Mobility Management Server.

In view of at least the above, it is readily apparent that Hanson *et al.* does not anticipate or suggest all limitations of claim 1 (and independent claims 17, 23, 24 and 27) and claims which depend there from. Accordingly, withdrawal of this rejection is requested.

The Examiner contends that as to claim 18 "reference is made to a method that corresponds to the system of claim 1 and is therefore met by the rejection of claim 1." Additionally, the Examiner contends that as to claim 28, "reference is made to a computer-readable medium that corresponds to the system of claim 1 and is therefore met by the rejection of claim 1." For at least the reasons discussed *supra* regarding independent claim 1, the subject invention as recited in claims 18 and 28 is not anticipated or made obvious over Hanson *et al.* More particularly Hanson *et al.* does not disclose a ***first computer system for directing a call to invoke a remote procedure in a second computer system,*** the first computer system and second computer communicating *via* a non-persistent connection. As noted above, Hanson *et al.* requires a ***host*** or ***fixed end system*** and the Mobility Management Server is simply a *proxy* for the Mobile End System. Therefore, Hanson *et al*, does not anticipate or suggest the subject invention as recited in claims 18 and 28. Accordingly, this rejection should be withdrawn.

II. Rejection of Claims 2-6, 9-14, 19-22, 26 and 30 Under 35 U.S.C. §103(a)

Claims 2-6, 9-14, 19-22, 26, and 30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Hanson *et al.* It is submitted that this rejection be withdrawn for at least the following reason. Hanson *et al.* does not teach or suggest all limitations as recited in the subject claims. Claims 2-6, 9-14, 19-22, 26, and 30 depend from claims 1, 18, 24 and 28 and, as noted *supra*, Hanson *et al.* does not teach or suggest a ***first computer system for directing a call to invoke a remote procedure in a second computer system***. Accordingly, withdrawal of this rejection and allowance of the subject claims is respectfully requested.

Conclusion

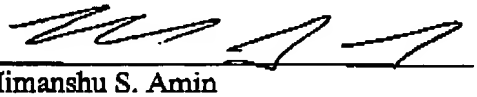
The present application is believed to be in condition for allowance in view of the above comments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

AMIN & TUROCY, LLP



Himanshu S. Amin
Reg. No. 40,894

AMIN & TUROCY, LLP
24TH Floor, National City Center
1900 E. 9TH Street
Cleveland, Ohio 44114
Telephone (216) 696-8730
Facsimile (216) 696-8731